

## REMARKS

This application has been carefully reviewed in light of the Office Action dated October 22, 2003 (Paper No. 26). Claims 1 to 31 are in the application, of which Claims 1, 10, 14, 26, 30 and 31, the independent claims, are being amended herein. Reconsideration and further examination are respectfully requested.

Claims 1 to 31 were rejected under 35 U.S.C. § 103(a) over excerpts from a book entitled "MS Exchange Users Handbook" (Mosher) in view of an IBM Technical Disclosure Bulletin entitled "Linking Handwriting Annotation with Text" (IBM) and further in view of U.S. Patent 5,590,257 (Forcier). The rejections are respectfully traversed.

The invention concerns information processing for reproducing images in which text data and ink data are overlaid in a time-sensitive manner. In reproducing images, it is important to take into account the position of the text and ink data in an original, in order to achieve an accurate reproduction. Thus, without a coordinate value of the reproduction position of the ink image, good relative positioning between images for the text and ink data cannot be maintained in the reproduction. In addition and when data is overlaid using a certain timing, without time information for use in the reproduction, the timing used in the original cannot be maintained.

The present invention addresses the foregoing situation by calculating a coordinate shift amount for the reproduction position of the ink image (Claims 1, 14 and 30) or the locus image (Claims 10, 26 and 31). In addition, the ink image (or locus image) has time information comprising a reproduction speed for the image. Thereafter, the ink image (or locus image) is output in a shifted position according to the coordinate

information, the calculated coordinate shift amount, and time information corresponding to the image.

The applied art is not seen to disclose or to suggest the foregoing arrangement, particularly as regards a calculation of a coordinate shift amount as well as an output of an ink image (or locus image) overlaid on a text image based on the calculated coordinate shift amount, the coordinate information, and the time information defining a reproduction speed of the ink image.

The Office Action specifically concedes that Mosher does not disclose or suggest outputting an ink image based on a calculated coordinate shift amount. The Office Action relies on Forcier as allegedly showing this feature. In addition, the Office Action indicates, at page 7, that the IBM reference shows moving text and annotations together by a predetermined shifted amount. The Office Action then indicates that Mosher, Forcier and the IBM reference, when taken in combination, disclose the present invention. Applicants respectfully submit, as discussed below, that no permissible combination of these references discloses the features of the invention.

More particularly, Forcier is seen to describe inputting both handwritten character images and character images input from a keyboard to the same line, discriminating the boundaries of a handwritten character image and character images input via the keyboard, and performing a wordwrap function on the displayed image. Forcier is not seen to disclose reproducing ink data overlaid on a text image at a reproduction position defined by a coordinate value shifted by a calculated coordinate shift amount. In addition, nothing in Forcier is seen to disclose or to suggest outputting an ink image which is overlaid on a new text image reproduced from text data, wherein the reproduction of the

ink image is based on the calculated coordinate shift amount, coordinate information of the ink image and time information, which defines a reproduction speed of the ink image.

The Office Action cites col. 10, line 35 to col. 11, line 67 and indicates that this portion of Forcier discloses shifting data down based on the input of preceding document data, and further cites col. 21, lines 31 to 67 indicating that this portion of Forcier discloses a relative and actual "X,Y" coordinate position.

Col. 10, line 35 to col. 11, line 67 of Forcier is seen to describe using beginning of line (BOL) markers, which are inserted into a document automatically or using an "insert BOL" command gesture. The BOL marker is understood to be used, for scrolling purposes, during word-wrap processing. If word wrapping occurs during input on a current line, the words to be wrapped are pushed to a new line inserted before an existing line, if the existing line begins with a BOL marker. If the existing line does not contain a BOL marker, the wrapped words are inserted in the existing line.

Col. 21, lines 31 to 67 of Forcier is seen to describe determining whether or not a handwritten image that is being input falls on the current input line, and to describe that the position of the handwritten image on the current input line is relative to the input line's left margin and bottom-most raster row owned by the input line. In other words, the cited portion is merely seen to identify an input line on which a handwritten image being input falls.

This is not seen to be the same as a coordinate value of the reproduction position of an ink image overlaid on a text image, and is certainly not seen to be the same as a coordinate shift amount calculated according to a new text image reproduced from the text data to which the character string was inserted.

Thus, unlike the invention, Forcier does not calculate a coordinate shift amount for the output position of its handwritten annotations, nor does it output the handwritten annotations based on a calculated coordinate shift amount.

Forcier is also not seen to describe reproduction time information defining a reproduction speed for the ink image.

While Forcier, at col. 2, lines 18 to 28, is seen to describe a time-ordering method used to capture and store input strokes representing an outline of a script character based on the order in which they are input. A technique for capturing and storing the input strokes is not seen to disclose using time information which defines a reproduction speed of an ink image for use in outputting a reproduction of the ink image. Further, nothing in Forcier is seen to disclose or even to suggest using such time information, together with a calculated shift amount and coordinate information, to output the ink image.

Accordingly, Forcier is not seen to disclose or to suggest outputting an ink image which is overlaid on a new text image reproduced from text data, wherein the reproduction of the ink image is based on the calculated coordinate shift amount, coordinate information of the ink image, and time information defining a reproduction speed of the ink image.

The Office Action indicates, at page 7, that the IBM reference shows moving text and annotations together by a shifted amount. However, the IBM reference is instead seen to describe using a special character, a line marker, that is inserted into text, which marks a position for displaying the annotation. When the text is moved, the link marker character is moved with the text, thus preserving the display position of the annotation. However, using a special character as a placeholder within text to mark an

annotation position is not seen to be the same as calculating a coordinate shift amount for the output position of its handwritten annotations, nor does it output the handwritten annotations based on a calculated coordinate shift amount.

Mosher has been carefully reviewed and is not seen to remedy the deficiencies noted above with respect to Forcier and the IBM reference.

Applicants therefore respectfully submit that the applied art does not show outputting an ink image which is overlaid on a new text image reproduced from text data, wherein the reproduction of the ink image is based on the calculated coordinate shift amount, coordinate information of the ink image, and time information defining a reproduction speed of the ink image.

Accordingly, independent Claims 1, 10, 14, 26, 30 and 31 are believed to be patentable over the applied art for at least the foregoing reasons. Withdrawal of the § 103(a) rejection is therefore respectfully requested.

The remaining claims are each dependent from the independent claims discussed above and are therefore believed patentable for the same reasons. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

In view of the foregoing, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney may be reached in our Costa Mesa,  
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our below-listed address.

Respectfully submitted,

  
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